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HEALTHY CATCHMENTS
HEALTHY OCEANS

Dear Rebecca

Submission re: Southern Rivers Draft Catchment Action Plan (CAP)

This letter sets out the comments of OceanWatch Australia in relation to the Southern Rivers Draft Catchment Action Plan (CAP). OceanWatch Australia is a national environmental, not-for-profit company that works to achieve sustainability in the Australian seafood industry through protecting and enhancing fish habits, improving water quality and building sustainable fisheries through action based partnerships with the Australian seafood industry, government, natural resource managers, private enterprise and the community.

OceanWatch Australia would like to commend the Southern Rivers CMA on the progress they have made with respect to the comprehensive incorporation of coastal and marine issues and related actions within the CAP. The contents of the coastal and marine themes within the CAP are an improvement on the previous blueprints and reflect to some extent the outcomes from the coastal and marine theme team meetings of which OceanWatch Australia was an active participant. We are very supportive of the approach taken by the CMA, however we do make a number of comments as follows.

1. General comments

The content information included within each program needs to be consistent across all program sections. For example, in the biodiversity program, definitions are provided, however in other programs they are not. In addition, in some programs, the "Response of the CAP" section includes the actual management targets, while in others it provides a summary.

The glossary provided with the draft CAP uses terrestrial definitions to describe various items, for example "condition". To ensure the community gains a clear understanding of the inclusion of coastal and marine matters in the CAP, it would be prudent to revise the definitions and expand them to include references to aquatic examples or legislation, where appropriate.

At the last coastal and marine theme team meeting, the overlap between the coastal and marine theme and the other themes was discussed and a representative from the CMA noted that where there was overlap, the targets from the coastal and marine theme would be removed and those matters picked up in the targets being developed across the other themes, for example with respect to water and biodiversity. All program targets need to be reviewed to



incorporate references to aquatic aspects of the target and ensure that the performance indicators are suitable. OceanWatch Australia has identified a number of examples where this needs to occur and have included them in the detailed comments on each program below, however our review has not been comprehensive. It is important that this is done before the CAP is finalised to ensure there are no gaps between what has been removed from the targets developed by the coastal and marine theme team that was submitted to the CMA Board.

It would be beneficial to provide an introductory paragraph at the beginning of each program to discuss what the program is about, the stakeholders etc. This approach has been adopted by other CMAs and we have found it to be effective at “scene setting” and providing context for each program.

In addition to providing a description of the intent, performance indicators and examples, it would be useful to include within each target table the mechanisms for delivery of the target, the priorities (being physical areas etc) and key terminology.

2. Southern Rivers region is characterised by diversity (Page 10, para 2, page 11 para 1)

Paragraph two states that the “current economic and social prosperity of the region is based on natural resources and includes primary industries such as.....oyster farming....”. Given the diversity of aquaculture activities occurring within the Southern Rivers region, it may be useful to amend this sentence to refer to “aquaculture, including oyster farming”.

The sentence “Actions arising from the CAP will include initiatives to engage more directly with a range of stakeholders...” should also make reference to the commercial fishing industry as a stakeholder to engage with.

3. Climate Change (page 12)

Although the draft CAP makes reference to the need to consider climate change in the implementation of the CAP, the CMA must factor into this the latest projections from the IPCC which suggest that global sea level rise is occurring at a rate of 0.9mm – 8.8mm p.a. This may have a significant impact within the 10 year timeframe of the CAP. Additionally, CSIRO researchers have developed a model/scheme which outlines how to retrofit recently developed plans and policies such that they allow for the impacts of climate change. Any actions to be undertaken by the CMA relating to climate change must also give consideration to the impacts on aquatic habitat, in particular saltmarsh, mangroves and seagrasses. Effective links also need to be established by the CMA between the current and breaking research and NRM planners and policy makers (see presentation from the Nature Conservation Council of NSW “The Great Greenhouse Gamble: A conference on climate change on biodiversity and natural resource management” held on 15-18 September 2005).

4. Guiding Principles for Implementation (Page 13)

OceanWatch Australia believes it would be beneficial to include a comment or an additional guiding principle on the links between the catchment, coast and marine environments. Although stating the obvious to some, it would be worthwhile to emphasise that the CMA works to ensure the linkages are considered in its programs.



5. *CAP as a basis for partnerships (Page 16 para 3)*

It is unclear as to the purpose of the paragraph “As the majority of vegetation communities....”. This paragraph does not appear to fit within this section. It may be beneficial to include a broader paragraph discussing some of the examples of partnerships already underway with the dairy industry, BHP etc within the region, rather than just singling out landholders.

6. *Overview of Catchment and Management Targets (Page 18, para 6 and para 10)*

It is not clear as to whether the water program includes estuarine waters. This is a recurring ambiguity throughout the CAP across the management targets relating to water and needs to be clarified. OceanWatch Australia is keen to see estuarine water included within the water program, given the connections between freshwater and estuarine habitats in a river system.

The sentence starting with “SRCMA is keen to work with” should be expanded to include local councils as they play a key role in the sustainable use of coastal and marine resources.

7. *Biodiversity Program (Page 22-37)*

The State, Pressure, Response table on page 21 – 24 refers to terrestrial vegetation and threatened species states and pressures etc, however does not include the issues related to aquatic habitat decline and degradation, or the aquatic threatened species or marine pests listed under the *Fisheries Management Act 1994*. These areas are not addressed within the coastal and marine program and our understanding was that to avoid duplication, they would be picked up under the other theme areas. This needs to be rectified.

As you are aware there is currently a national system for the management and prevention of invasive marine species being developed by a working group consisting of commonwealth and state agencies, industries (OceanWatch Australia represents the commercial fishing sector and is currently rolling out the system to the Australian seafood industry), researchers and other stakeholders. This system’s development is reaching a stage where communications will shortly be occurring to roll out the biofouling guidelines to a number of vectors. We suggest an action be incorporated in the biodiversity program to implement the relevant actions arising from the national system, in liaison with the Department of Agriculture, Fisheries and Forestry who is the lead agency on this project.

We see a key role for the CMA under the ‘Response of the CAP’ to implement mechanisms to ensure that mapping and certification of wetlands and other areas of significant ecological value feed back into the relevant NRM plans such as the LEPs and REPs.

BC 1 and BC 2: The definition provided for “vegetation community” in the Glossary section of the CAP is a land based definition. It needs to be expanded to include critical aquatic habitats such as saltmarsh, mangroves and seagrass. B1 currently has a terrestrial focus and needs to be expanded to include aquatic biodiversity conservation. The definition for “key ecological communities and species” needs to make reference to the *Fisheries Management Act 1994*.

BM1 and BM2: This target needs to be expanded to include industry as a stakeholder to gain knowledge and skills.



The intent of BM1 is to gain attitudinal change amongst the identified stakeholders, however the performance indicators listed do not adequately measure this. Alternatives such as long term measures may be required as attitudinal change does not happen quickly. Does BM2 include aquatic/riparian vegetation?

BM7: The reference to Caulerpa should be *Caulerpa taxifolia* as there are a number of species of Caulerpa, of which only one has been identified as a “noxious weed” by the Department of Primary Industries.

8. Water Program (Page 39 – 58)

The first row of the State, Pressure, Response table is about Water Quantity and given the headings given to the other rows, to be consistent a heading should be provided here. It would also be beneficial to provide a sentence in the pressures column on the impacts that a lack of fresh water flows has on those industries that use the estuaries and rivers, such as aquaculture and commercial and recreational fishing, to again show the linkages between catchment activities.

Poor water quality is also caused by inappropriate landuse management practices such as from some forestry and agricultural activities.

WCT: It is unclear as to whether “water bodies” includes estuarine and marine. This needs to be clarified. OceanWatch Australia would like to see it included. The benchmarks being considered to establish baseline data should include dissolved oxygen as an indicator of river health.

W2: A whole of coastal CMA approach is required to ensure a coordinated and strategic approach to water quality monitoring across the state. We recommend that the 5 coastal CMAs work together to ensure consistency in data collection and interpretation. Again, W2 seems to imply that it includes estuaries however, it is not clear. It may be useful to provide a definition of what is meant by a watercourse. The performance indicators that have been suggested are not measurable. As an alternative, the number of reported fish kills may be a useful indicator of water quality.

W3: Although W3 discusses an integrated approach to water cycle management, emphasis needs to be given to the impacts from sewerage treatment plants (STPs) on water quality in the region’s rivers, estuaries and marine environments. There is increasing pressure to augment current STPs or create new STPs in estuaries to cater for the population growth and increased peak holiday loads. This will have significant impacts on the quality of the receiving waterways, aquatic habitats and the health, viability and operation of the region’s recreational and commercial fisheries (including aquaculture). This is a key issue in the light of the NSW government’s recent draft policy paper *Management of Sewage Effluent in NSW*, which outlines the government’s opposition to new ocean outfalls unless it clearly demonstrates that the environmental and public health risks of alternative options would be greater.

W4: The inclusion of the implementation of stormwater management plans as an example of catchment activities to support W4 may be better placed against W2 as stormwater management usually addresses water quality issues.



W5 and subsections: Again, it needs to be explicit as to whether these targets include estuarine areas. OceanWatch Australia would like to see them included. W5(d) needs to be refined to be measurable. To do this, the target could read “*By 2016 priority actions and works are implemented to protect and enhance 60 wetlands of national and regional importance identified as priorities*”.

9. *Soil and land capability program (Page 59 – 79)*

SL2, SL8 and SL9 are not “SMART” targets and need to be refined to include a timeframe and be quantified in terms of what will be achieved. For SL2, this information has been provided, however is built into the examples of activities to support the target.

The intent of these targets should also include the need to educate landholders on the downstream impacts of their activities.

SL5: The word “manage” needs to be defined, as it is a broad term, particularly in relation to acid sulphate soils.

10. *Community and partnerships program (Page 80 – 92)*

The Catchment Target for this program should be expanded to not only include healthy landscapes, but also seascapes. Again, in C5 the CMA should be looking to measure long term attitudinal change.

11. *Coastal and marine program (Page 93 – 107)*

Following on from the above comments relating to climate change, the CAP needs to be able to accommodate new and emerging science in relation to climate change. The current research has more certainty in the predicated and observed short term impacts of climate change, particularly research and modelling conducted by CSIRO and the Institute of Marine Science at the University of Sydney (Dr Peter Cowell).

Within the State, Pressure, Response table under the pressure column, we see a key role for the CMA being to encourage agency responses regarding natural resource use to consider cumulative impacts, particularly with respect to planning decisions.

In relation to the mechanical opening of ICOLLS, we see a key role for the CMA in ensuring that council policies are in line with current scientific research, for example, the recent paper by M.V. Jones and R.J. West “*Spatial and Temporal Variability of Seagrass Fishes in Intermittently Closed and Opened Coastal Lakes in South-eastern Australia*”. The roll out of the sustainability assessments of coastal lakes is to include specific guidelines, however as this is a slow process, councils will need interim guidelines in place.

Within the row “Sustainable Management of Aquatic/Marine Resources”, reference needs to be made to the responsibility of the CMA for coastal waters out to 3 nautical miles. This may be better suited to an introductory paragraph to the program.

Again, it would be beneficial to include some introductory remarks regarding the marine based industries within the SR region to provide context and also, not only the environmental and intrinsic values that the coastal and marine environment provides, but also the social and economic and operational values. An explanation of the roll of the CMA with respect to fisheries management would also be beneficial to ensure expectations or perceptions of the



community can be addressed. An introduction could also provide a means to explain how the other program targets incorporate some aspects of coastal and marine program. The approach taken by Northern Rivers CMA to explain the linkages is a good example.

CM2: In the Water Quality program, reference is made to using the Shellfish Harvest Areas classification as a benchmark. Given the National Land and Water Resources Audit classifications of estuaries are also to be used, it will be important to ensure consistency between these two benchmark tools. “Condition” needs to be defined to ensure the community has a clear understanding as to what is meant by it. It would also be worthwhile to define what is meant by “natural resource management plans”.

To meet this target it will be necessary for not only local councils and state agencies to work together, but for state agencies to act with a coordinated approach rather than with a silo mentality. We believe that this will require political will in addition to partnerships and incentives. This is something the CMA will have little control over and should be factored into the ability of the CMA to deliver on this target. The intent of this target should be expanded to read “... *This will be achieved by using and acting on current knowledge and studies to improve the condition of estuaries in partnership with estuary users and through the use of targeted incentives.*”

Under the examples of activities that will support this target reference is made to oyster farmers remediating water quality issues. The oyster industry is required to undertake water quality monitoring to meet food safety guidelines. It would be better if this statement could be worded to remove the reference to oyster farmers and be written to reflect the partnerships that are forming between the farmers, oyster growers and commercial fishers to undertake remedial activities.

The statement regarding “managing the impacts of effluent from industry” also needs to be clarified as to what is meant by industry, ie mostly land-based industries.

CM3: This target needs to be further refined to make it measurable. To do this a number for the amount of key aquatic/marine industries that will undertake best management practices could be used. As an alternative, a more effective target may be “By 2016 Best Management Guidelines and/or Environmental Management Systems developed and implemented by all key marine resource industries (all guidelines developed by 2009)”. The examples of activities that may be undertaken against this target misses the mark in relation to the intent of the target. The approach taken by Northern Rivers again for this target is a good example of what would be undertaken.

The mechanism by which farmers/landholder industry partners develop and implement best management practices should be applied to commercial fishers. For example, fishers should be provided with the assistance of Community Support Officers who provide landholders with assistance to leverage funding to implement plans etc.

CM4: Again this target needs to be refined to include “developed and implemented” as there are some active management arrangements that are not in place yet and will need to be developed in partnership with key stakeholder groups. The performance indicators listed are not measurable indicators and need refinement. There may be performance indicators developed from some of the programs/activities listed, and if that is the case it needs to be



stated. Other indicators could include the area of the marine environment classified as marine protected area. It would be beneficial for the intent of this target to recognise the need to ensure adequate consideration is given to the social and economic impacts of establishing marine parks, particularly for those users who are likely to lose access to some areas.

Please do not hesitate to contact me on 02 9660 2262 should you require further information on any of the comments made.

Yours sincerely



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